RE: Harbor pathogen TMDL
Miller, Robin
to:
Rosella OConnor
01/11/2012 12:35 PM
Hide Details
From: "Miller, Robin" <Robin.Miller@hdrinc.com>

To: Rosella OConnor/R2/USEPA/US@EPA

History: This message has been replied to.

Rosella:

I hope this answers your questions. The model run was done with the Passaic River and Saddle River loads set at a constant concentration of 35/100 ml Enterococci. This is not the same thing as a geometric mean concentration which is the point we have been discussing. State input would be needed for the variation to include in the Upper Passaic and Saddle loads We wouldn't know that upfront and depending upon how the upstream reductions are done, the variability may be different than the variability in existing data. Keep in mind that the flows for these Rivers are varying daily in the model so that even with constant concentration these tributary loads are already time variable. There is also the business of E coli to Enterococci conversion.

For any time variable load in a TMDL model, not just the boundary, the procedure that has been followed is:

1. The time variable load is reduced by the needed or prescribed percentage reduction, keeping the variation.
2. The mass delivered by the time variable load is summed over the duration of the simulation and then divided by the number of days to express the load as a total maximum daily load.
3. The number of days can vary. Loads such as tribs and STPs that go all the time are divided by total number of days. Wet weather loads such as CSO and SW can be divided by number of wet days which is recommended for pathogens. We talked about this on one of the calls with EPA and the State.

For the Harbor toxics TMDL we drafted the document for recently had time variable loads handled in this manner.

Regarding budget, we have about 50% of the document budget still left and 100% of the budget for responding to technical comments still left.

ROBIN LANDECK MILLER

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HydroQual is now HDR|HydroQual

From: Rosella OConnor [mailto:OConnor.Rosella@epamail.epa.gov]
Sent: Wednesday, January 11, 2012 9:12 AM
To: Miller, Robin
Subject: Fw: Harbor pathogen TMDL

Hi Robin - Below is Barbara's e-mail regarding the boundary condition at the Dundee Dam. It is my understanding that the boundary condition was a seasonal geometric mean (as opposed to a "never to exceed" - as mentioned below). Also, following up on our discussion on how to deal with the boundary - can you please describe how the "variation" would be factored into the boundary load and how it affects the TMDL calculation. If the boundary load is variable, then the TMDL would also end up with variable reductions and loads (?).

Thanks,
Rosella

----- Forwarded by Rosella OConnor/R2/USEPA/US on 01/11/2012 09:06 AM -----

From: "Barbara Hirst" <Barbara.Hirst@dep.state.nj.us>
To: Rosella OConnor/R2/USEPA/US@EPA
Date: 01/10/2012 04:04 PM
Subject: Harbor pathogen TMDL

Rosella,

Re: Pathogen TMDL for NY/NJ Harbor

Based on our recent discussions, the schedule appears to be lagging and EPA is facing a budget problem. In addition to the delay experienced in resolving the issue of "what it would take" to achieve the entero geomean in all cells in the Hackensack (not the 40% previously presented in project reports), we have recently learned that "meeting standards" at the boundaries meant a model input assumption of never exceeding the 35 entero level, which is decidedly more stringent than the intended standard expressed as a geomean, thus not the same as "meeting standards". To address this issue, we are continuing to work with Stevens to be able to provide appropriate input assumptions based on the modeling of the Passaic River above Dundee Dam. The Stevens work is expected to take at least another month.

As to the budget, we are very concerned by the information you shared yesterday that there is not enough money to 1) correct the model runs, 2) provide the agreed upon tmdl documentation and 3) provide assistance with responding to technical comments received after the tmdl is proposed. We will need to discuss how all these needs can be accommodated in order to be able to move forward with Harbor pathogen tmdls.